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May 27, 2014

VIA ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007

Re: AIG v. Dep't of Financial Services and Benjamin M. Lawsky, 14-cv-2355 (AJN)

Dear Judge Nathan:

As counsel to Plaintiff AIG, we write pursuant to this Court's Rule 3(F) and Order dated April 29, 2014 (Dkt. 15) to advise the Court that, in light of the DFS's express references in its motion to dismiss (Dkt. 22, at 4-5, 25, 30) to alleged violations of N.Y. Insurance Law sections 2102 and 2117, AIG intends to file an amended complaint to include those sections in its requested relief.

Given that the anticipated changes will be minor, and consistent with AIG's desire to proceed expeditiously, Plaintiff is prepared to file its amended complaint no later than Monday, June 2, 2014, and respectfully proposes the following briefing schedule: (i) Defendants' response (answer, new motion to dismiss, or letter indicating that Defendants will stand on their already-filed motion) would be due two weeks from the date that the amended complaint is filed; (ii) Plaintiff's opposition to any motion to dismiss would be due two weeks thereafter; and (iii) Defendants' reply would be due one week thereafter.

Respectfully submitted,



Kathleen M. Sullivan

cc : Elizabeth Forman, Esq.
Elizabeth Prickett-Morgan, Esq.

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